



ideas that work

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**Project Description and Scope of Work Narrative
Project Plan and Site Plan Application (Level 2)**

I. Introduction

On behalf of Community Associates (the "Applicant"), we are pleased to submit this Project Plan Pre Application Meeting (PAM) application pursuant to Article 7 of the City of Rockville Zoning Ordinance (the "Zoning Ordinance") for the property located at 2401 Wootton Parkway in Rockville, Maryland (the "Property").

The Property is currently improved with an approximately 52,000 square foot enclosed shopping center which formerly housed a Giant grocery store and other small retailers. Since its construction in the 1970's, the center has faced ever increasing market competition from new and better-positioned retail in close proximity to the property. As a result, Giant Food vacated their grocery store nearly four (4) years ago and their long-term ground lease for the entire center (including the smaller stores) is set to expire in April 2017. The store was only about 30,000 square feet in size, far less than the 50,000 - 65,000 square feet floor plate of a typical supermarket in today's market. Despite their best efforts, the Applicant has been unsuccessful at finding an anchor tenant to lease the vacated space. Many of the other small tenants either have or are expected to close their operations, or fail to re-lease their spaces over the next year, due to the lack of an anchor to draw in customers.

The Property is in the PD-RS (Rockshire) Zone, but the Equivalent Zone for the site is the Mixed-Use Neighborhood Commercial ("MXNC") Zone which allows townhomes. The Applicant has performed a market study (included as part of this Application) and believes that the Property is best suited for redevelopment as a upscale townhome community with the opportunity for some retail space incorporated into live-work units and suitable for neighborhood-oriented retail and service needs. The townhomes will complement the adjacent single family neighborhoods to the north, and west, as well as the existing townhomes to the east and south. The new townhomes, retail space and the associated parking and improvements are collectively referred to herein as the "Project".

As explained in this Statement of Justification, the Project is consistent with all applicable recommendations of the 2002 Approved & Adopted City of Rockville Comprehensive Master Plan (the "Master Plan"), and will conform to all applicable requirements of the Zoning Ordinance for development in the Mixed-Use Neighborhood Commercial ("MXNC") Zone.

II. Property Description & Existing Conditions

A. Site Location & Characteristics

The Property is a 7.32 acre record lot known as Parcel A, Rockshire Village Center. The Property is located in the southeast quadrant of the intersection of Hurley Avenue and Wootton Parkway, with frontage on and direct access to both of these two-lane streets. The Property is located in close proximity to I-270 and Rockville Pike and a great variety of newer and better positioned full service local and regional shopping centers including Falls Grove and Parc Potomac.

B. Zoning and Permitted Uses

The Property is zoned PD-RS (Rockshire) which is described as a principally residential single family zone, but allows many other uses, including townhomes, and townhomes in fact adjoin the site on 2 sides. The redevelopment of the site will be governed by the MXNC ("Mixed-Use Neighborhood Commercial ") zone as this is the equivalent zone which was applied to the Property. This is because the proposed new development differs from the use approved in the Planned Development Governing Documents which provided for the now largely vacant retail center. Section 25.14.07.e. "Amendment of a Planned Development" says that the following amendments to a Planned Development such as Rockshire are subject to the equivalent zone standards:

- a. Increase in the number of dwelling units
- b. Increase in building heights
- c. Addition of new uses
- d. A major relocation of streets
- e. Other significant changes the Planning Commission determines are a substantial deviation from the Planned Development Governing Documents.

The proposal for the Property will replace retail uses with residential and retail uses hence the standards of the MXNC zone apply. The Zoning Ordinance permits a variety of uses by right in the MXNC zone, including townhomes and live-work units.

C. Surrounding Land Uses

The Property is part of Rockshire and is surrounded by primarily single family and townhomes. There is also a church and a community swimming pool adjacent to the Property on the east.

III. Prior Approvals

Rockshire was initially planned in the early 1960s and was the subject of an exploratory application submitted in 1965. In 1966, PRU-4 was approved by the Mayor and Council allowing construction of 845 dwelling units consisting of 325 townhouse units, 400 single-family units and 120 high-rise apartments. A revision in 1968 called for a shopping center, theater, swimming facilities and recreational use, a 120 unit high-rise apartment building and 200 townhomes. Various revisions were approved in 1970 and 1971 and the first homes followed. In 1973, Giant Food, Inc. filed an application for a mini-mall shopping center of 115,000 sq. ft. which was later approved for only 52,915 sq. ft. That approval was appealed by residents but the courts ultimately upheld the approval despite several appeals. Multiple changes to Rockshire then occurred throughout the 1970's under various City approvals including an approval in 1981 to construct 34 townhouses on the site previously approved for a library and high-rise apartment building. And an additional 38 townhomes were approved in 1989.

IV. Project Description

A. Purpose

Based on the decline and ultimate failure of the retail center due to the newer and better located and positioned full service retail centers in close proximity, the property owner began exploring options for the site in an effort to help ensure a viable reuse of this property and the avoidance of an abandoned shopping center and the resulting negative impacts on the surrounding community and the City of Rockville. Options included new retail uses for the existing building, demolition and construction of a new retail center, multi-family housing, townhomes and one or more combinations of the above. As a longtime local developer and property owner of all types of properties throughout the Washington region, applicant drew on its experience with respect to each form of development and engaged outside consultants to assist in the evaluation.

One such consultant, StreetSense, conducted detailed market analyses regarding retail uses and prepared a study, concluding that it would not be feasible to find new anchor tenants for the existing space and that substantial retail use for the property was not feasible. Ultimately, after multiple meetings with members of the community, the Rockshire Homeowners Association and others, the applicant concluded the most feasible and appropriate use for the property will be a combination of townhomes with some live-work units that could provide opportunities for some neighborhood-oriented retail services.

At the same time, there is a growing need for housing throughout Montgomery County and particularly in the City of Rockville. The Metropolitan Washington Council of Governments

recently published growth projections for the Washington Metropolitan area including the City of Rockville. Those projections call for an additional 23.6 thousand residents in the City within the next 29 years. This is approximately a 36% increase over the present population. Rockville, like the rest of Montgomery County, is a desirable location for those who want to move here and those who live here now also continue to add to the population base. Jurisdictions throughout the area are facing similar growth and are working to plan for it. One planning phenomenon that largely controls the location of housing for these future residents centers on the recognition that much of Montgomery County is preserved for agriculture and a huge additional amount is protected parkland. When adding in roads and developed sites that are not likely to be redeveloped in that period of time, the County has concluded that they only have 4% of the entire County land resources available to accommodate future development. Another goal is to locate housing where public infrastructure already exists and where that housing is close to job centers like Rockville and the Shady Grove Life Sciences Center.

The result is a growing need for redevelopment of under-utilized properties at “infill” locations, and those where the existing use no longer is feasible. Aging and under-performing shopping centers have become desirable locations for new housing. In fact, in conjunction with the Urban Land Institute, Montgomery County undertook a particular study, the result of which was a recommendation for building housing on these sites much the way housing is being planned for the Rockshire Village Center.

B. Development Program

The proposal is for 88 townhomes (including 6 live/work units with retail space on the lower level and 11 MPDU's). It will be laid out in a traditional manner with groups of townhomes having 5 to 8 units in the row in a predominately rear-loaded design prevalent in modern, upscale townhome projects. Private streets will serve the development. Ample green area will be provided both along the periphery of the Property and in an interior courtyard or common area. The common area will connect to an existing hiker/biker trail which runs along Wootton Parkway. The common area will also act as the core of the development and encourage recreational use of the adjacent trail. The architectural design of the proposed townhomes will complement the existing neighborhood. Parking will greatly exceed that required by offering two garage and two driveway parking spaces for most of the townhomes, with one garage and one driveway space for the smaller units. There also will be visitor parking along the roads within the project. The Project will also include a parking area with 50 spaces to serve the community pool.

The Project will comply with applicable development standards as reflected in the table in Section VI B below and the proposed buildings will provide an appropriate transition to the adjoining townhomes and the surrounding residential community.

C. Parking

1. *Automobile Parking-*

The parking provided under the proposed Plan will substantially exceed the requirements of Section 25.16.03 calling for two spaces per dwelling unit. The Plan contemplates 82 townhome units, 78 of which will have two car garages and two driveway parking spaces. The remaining 11 townhomes will have one car garages and one driveway space. The six live-work units will have 5 spaces located in front of those units. Additionally, applicant plans 17 additional spaces along the private streets. Finally, the application contemplates a parking lot designed to provide the Rockshire HOA with parking in accordance with the agreement dated May 25, 1977. Although this parking agreement only requires the applicant to provide approximately 30 - 32 parking spaces, the proposed parking lot has been designed with 50 spaces primarily to serve the Rockshire swimming pool, but also could potentially serve as additional parking for other neighborhood uses.

2. *Bicycle Parking*

Adequate bicycle parking spaces will be provided to accommodate the proposed development in accordance with the aforementioned requirements.

D. Traffic & Vehicular Circulation

Access to the Property is currently provided from both Wootton Parkway (at a signalized intersection) and Hurley Avenue. The existing access at Wootton Parkway will remain unchanged by this Application but the plan contemplates moving the Hurley Avenue access closer to Wootton Parkway.

The Project in its entirety will generate fewer trips than the existing use. The attached table compares the am and pm peak hour trips. It shows that the retail center would generate 142 am peak hour trips, 455 pm peak hour trips, and 645 Saturday peak hour trips. By contrast, 82 townhomes and 6 live-work units would generate 42 am trips, 73 pm trips and 68 Saturday peak hour trips.

E. Public Use & Amenities

Under the MXNC Zone, the Applicant is required to provide a total of 10% of the net lot area as open area, within which at least 5% must be devoted to public use space. The Project provides a significant amount of open area and public use space on-site and more than the existing use. There will be approximately 35 percent open space of which approximately 22 percent will be public use.

The plan provides for generous landscaped areas both along Wootton Parkway and Hurley Avenue. The area along Wootton Parkway will incorporate the Millennium Trail but will greatly enhance the current conditions by providing additional landscaping, lawn areas for public use and an inviting entry into the central courtyard of the project. It will also incorporate outdoor area adjacent to the live-work units to attract users of the Millennium Trail to retail services located there. Similarly, the area along Hurley Avenue includes extensive landscaping and green space. Whereas both frontages now feature back of house operations for the retail center including loading and circulation, this plan anticipates residential units fronting on those green spaces to make them more welcoming to the public. Central to the project will be a large common area with benches and other amenities to create an inviting public space both for the residents of the townhomes as well as the surrounding community.. Finally, a green area for outdoor activities and potential farmer's market operations will be located between the live-work units and the proposed parking lot.

F. Civil Engineering

1. Natural Resources Inventory/Forest Stand Delineation

The Property is subject to the City's Forest and Tree Preservation Ordinance. A Natural Resource Inventory/ Forest Stand Delineation ("NRI/FSD") is required for this site and is submitted concurrently with this PAM application. The NRI/FSD indicates the site contains no forest. A Preliminary Forest Conservation Plan will be submitted at the time of Project Plan.

2. Stormwater Management and Sediment & Erosion Control

The Project will comply with the requirements of Chapter 19 of the City Code. As previously mentioned, the Project will result in an overall net decrease in the impervious area on-site by approximately 7%. Additionally, the Project will provide on-site quality and quantity stormwater measures, including 15 open space and 23 roadside planter box micro-bioretenion facilities. The Applicant will submit a Sediment and Erosion Control Plan to the Department of Public Works ("DPW") for their approval prior to commencement of construction.

3. Utilities

Existing dry utilities that serve the Property are buried below-grade and will serve the new development. Any new utilities required will be buried below-grade.

V. Comprehensive Plan Conformance

The Property is located in Planning Area 14 ("Rockshire and Fallsmead Neighborhood"), as identified in the Master Plan. The following excerpts are from the Master Plan page 11-54:

Planning Area 14 was developed primarily in the 1970s and 1980s. Compared to the neighborhoods around the town center and east of Route 355, it is still considered to be one of Rockville's newer neighborhoods. Houses are generally in good condition, although property maintenance may become more of an issue during the life of this Plan, and are generally larger than those in the older neighborhoods. Streets tend to be curvilinear with sidewalks, lined with mature trees, and end in cul-de-sacs. Generally, entrances to the individual subdivisions are limited. Traffic within the subdivisions is limited to the neighborhood, although residents are concerned about the potential for cut-through traffic as congestion increases on primary routes in and around the planning area.

Rockshire is the largest of the Planned Residential Units (PRUs) in the city. A PRU is a special development within the zoning regulations wherein greater flexibility is allowed in the layout of the subdivision so that other community goals can be achieved. In this case, some of the lots are smaller than would otherwise have been permitted under traditional zoning (R-90 and R-150). This clustering of houses creates more overall open space for the community. The planning area is developed primarily with single-family homes although there are a number of townhouse developments throughout the planning area.

There are also three senior citizen housing projects within the planning area. The Latvian Home is located on Hurley Avenue. The National Lutheran Home for the Aged is located on 25.5 acres of land along Veirs Drive adjacent to the Lakewood Country Club. It is a large facility that offers independent living units as well as nursing home care. Collingswood Nursing Home is located on the corner of Hurley Avenue and Dundee Road. It is currently expanding to offer additional care.

The Rockshire Village Shopping Center was developed as a part of the Rockshire Planned Residential Unit. .

There are several schools within the planning area: Lakewood Elementary School, Fallsmead Elementary School, Robert Frost Middle School, and Thomas S. Wootton High School. These are part of the Thomas S. Wootton Cluster. All meet capacity levels for student enrollment under applicable City standards.

The 213-acre Lakewood Country Club is located in the western edge of the planning area. Currently, it provides a sense of green open space for parts of the community although it is privately owned and public access is limited. It is the largest parcel within the planning area that could potentially be developed. Currently, it is zoned R-S. Development recommendations are discussed in the Land Use section of the master plan. The city owns a small parcel of undeveloped land on Wootton Parkway adjacent to the country club.

There are approximately 150 acres of city-owned parkland within the planning area. Parks include Horizon Hill Park, Rockmead Park, Wootton's Mill Park, and Glenora Park. All of these parks contain play equipment, playing field(s) and courts. These parks also have land that surrounds either Watts Branch Creek or its tributaries, offering some watershed protection to those streams. In addition, there is open space associated with the Fallsmead subdivision that provides green space to the neighborhood.

Wootton's Mill Park is the largest park in the area at 76.2 acres. It surrounds both sides of Watts Branch Creek providing environmental protection to the watershed. The park contains play equipment, tennis and basketball courts, garden plots, and trails. It functions as a forest preserve and an urban wildlife sanctuary. The ruins of Wootton Mill have been identified within the park. This is considered a significant historical and archaeological resource for the City of Rockville as the site of a water-powered mill that operated from ca. 1813 to 1905. The mill derived power from Watt's Branch to process grain and saw logs for landowners and neighbors. In addition, Dr. William Henry Holmes depicted the site in art works from ca. 1905 to 1917, many of which are in the collection of the National Museum of American Art. He lived at the Wootton's Mill miller's house from 1905 –1917 and was a significant personage in American art, ethnology, and archeology.

Under critical issues and development the plan states:

It is not recommended that an individual neighborhood plan be prepared at this time because there are no major land use issues to be considered other than the possible development of Lakewood Country Club which is covered in the Land Use Chapter.

The Master Plan describes the existing conditions of the Property and surrounding Rockshire community. Given that the retail center was fully operational at the time the Master Plan was written, it did not contemplate redevelopment of the site. This is typical of a Master Plan, particularly one that is almost 15 years old. The Plan does generally support an increase in housing to serve the needs of the population and of new housing types. This application is consistent with applicable City Master Plan provisions.

VI. Zoning Ordinance Conformance

A. Purposes

Section 25.13.02 of the Zoning Ordinance states that the MXNC Zone is "[i]ntended for sites that are either currently developed or recommended for development primarily for local retail and service uses in areas either within or in close proximity to single unit detached residential uses. This zone allows for moderate density development of retail, service, office and

residential uses. The zone is not intended for major employment, so office uses are limited." It includes the following general purposes:

High quality pedestrian oriented neighborhoods

Provide a variety of residential uses and diverse styles of housing

Provide efficient land uses particularly a development pattern more flexible in adjusting to market conditions and local growth fluctuations.

As discussed above, the Project implements all these purposes. The Project also responds to the objectives of the Zoning Ordinance for the MXNC Zone by revitalization of the site so that it does not become a blight on the neighborhood. The proposed Project will replace existing surface parking with a landscaped common areas and architecturally pleasing residences which complement the area. The improvements will reduce impervious surfaces and result in the installation of stormwater management quality and quantity technology that will further important environmental objectives. The Project has been carefully designed to maintain this compatibility, with a particular sensitivity and emphasis on addressing impacts to nearby residential uses.

B. Development Standards

For the MXNC Zone, the density of development is determined by compliance with the various development standards set forth in Section 25.13.05, additional design guidelines of Section 25.13.06, and special design regulations of Section 25.13.07 for mixed use zones. The Project complies with the applicable provisions of the Zoning Ordinance, as described herein below.

i. Section 25.13.05 – Development Standards NEED DATA FOR TABLE BELOW

Section 25.13.05.a requires compliance with any build-to lines established by the relevant Master Plan (by placing at least 70% of the length of the building wall facing that line at the build-to line), or any building restriction lines established by the Zoning Ordinance in Section 25.17.08. In this case, the Master Plan does not establish any build-to lines applicable to the Property, and the Zoning Ordinance does not establish any building restriction lines that would be applicable. The Project therefore complies with Section 25.13.05.a.

The Project fully complies with the applicable development standards for the MXNC Zone set forth in Section 25.13.05.b:

	REQUIRED/PERMITTED	PROPOSED
Maximum Height (in feet)	45 ft.	45 ft.
Total Open Area Required	10%	35%
Public Use Space	5%	22%
Minimum width at front lot line (in feet)	10 ft.	Minimum 10 ft.
Setbacks Abutting Public Right-of-Way	10 ft.	20 ft.
Side Setback: <ul style="list-style-type: none"> Abutting Residential Abutting Non-Residential 	25	25 ft.
Rear Setback: <ul style="list-style-type: none"> Abutting Residential 	25 ft. or height of building	25 ft.

ii. *Section 25.13.07 – Special Design Regulation*

The development standards in the MXNC zone in this section generally apply to commercial/retail development in the MXNC zone. The subject application is primarily residential in nature, with limited live-works in six of the units. It is not a commercial development project where commercial design standards apply. Nevertheless, in terms of the provisions in Section 25.13.07(e), the buildings are appropriately located with respect to the property line. Secondly, the uses by floor are primarily residential with the exception of commercial uses permitted in the designated live-work units. Building façades are residential in character and satisfy all appropriate design requirements. Fenestration includes windows, doors and other features that maintain compatibility with existing contiguous development. In fact, the residential character of the proposed development is even more compatible with contiguous projects than is the existing commercial development. Sidewalks are included both within the project and along its borders. Parking is appropriately located for a project of this nature.

To the extent any equivalent zone standards of the MXNC zone conflict with this project, the applicant seeks a waiver under Section 25.14.07. As reflected in the plans being submitted, the project is entirely compatible with completed portions of the planned development. Secondly, the plan is consistent with good planning and design principles. It blends perfectly with the existing community by primarily incorporating residential uses in a residential area. It is inappropriate to apply commercial development standards to residential buildings.

C. Landscaping and Screening

The Project will comply with the requirements of the Landscaping, Screening and Lighting Manual (the "Manual"). All proposed landscaping and screening is in accordance with the provisions of the Forest and Tree Preservation Ordinance.

The proposed Project will eliminate a significant portion of the existing surface parking and replace it with approximately 35% green area and approximately 22% public use space. A portion of the existing surface parking lot will be replaced with a significant amount of new landscape in the form of street trees, new building foundation plantings, enhanced buffer plantings, and new entrance plantings. Native and adaptive species well suited to the specific project site conditions and climate will be used. Plants will be appropriately located and spaced for anticipated mature size, lines of sight and solar orientation.

D. Signage

The Project will have signage along Wootton Parkway and Hurley Avenue. All necessary signage will comply with applicable requirements of Article 18 of the Zoning Ordinance.

E. Green Building Requirements

The Project will comply with the City's Green Building Standards by minimizing the development's impact on the environment, and meeting the new 2015 International Green Construction Code (as applicable).

VII. Findings for Approval NEED TTO REVISE FOR PROJECT PLAN/SITE PLAN

As required, the Project will not:

- i. *Adversely affect the health or safety of persons residing or working in the neighborhood of the proposed development;*

Redevelopment of the Rockshire Village Center under the proposed plans will not adversely affect the health or safety of persons residing or working in the neighborhood. To the contrary, it

will help in various regards. The environment will be improved through new stormwater management measures and a reduction in the impervious area of the site. Bicycle and pedestrian systems will be improved for the use of the public. The high trip generation characteristic of a retail center will change to a lower number of daily vehicle trips related to the housing. Finally, redeveloping a largely vacant and soon to be entirely vacant shopping center will avoid the adverse implications of vacant commercial properties on a surrounding residential area.

ii. *Be detrimental to the public welfare or injurious to property or improvements in the neighborhood;*

The proposed Project will in no way be detrimental to the public welfare or injurious to the property or improvements in the neighborhood. Rather, the Project will provide numerous benefits to the neighborhood and the City as a whole, including:

- Promoting the City's economic development objectives by providing new residential units for a growing population and by allowing a viable reuse for a failing shopping center which could become a blight on the community and negatively impact property values;
- Reducing traffic.
- Converting existing impervious surface parking lots into attractive residential of a new type and meaningful open amenities space; and
- Decreased imperviousness on-site.
- Increased pedestrian connectivity;
- Potential hiker/biker trail along property frontage on Hurley Avenue;
- Opportunity for enhanced plantings and landscape features along Millennium Trail frontage with direct connection to new townhome community;
- Completion of a section of sidewalk from the Hurley Avenue/Sherbrooke Way intersection serving Rockshire HOA pool.
- Appropriate stormwater management and fire/emergency services access;
- Enhanced green space and landscaping;
- Reduced noise impacts, e.g. from retail deliveries at loading dock;
- Reduced truck traffic in and around site;

- Reduced lighting impacts on surrounding community.

iii. *Overburden existing and programmed public facilities as set forth in Article 20 of [the Zoning Ordinance] and as provided in the adopted adequate public facilities standards;*

The Applicant's preliminary analysis indicates that there are adequate public facilities with respect to transportation, schools, fire and rescue, water and sewer capacity to accommodate the proposed Project.

A Comprehensive Transportation Review ("CTR") Scoping Intake form has been submitted to City Staff, and the formal requirements for the CTR study have been established through the scoping process, as detailed in the scoping letter prepared by the City. Based on the proposed development plan, before accounting for any TDM reductions, the project will generate approximately 100 AM peak hour and 382 PM peak hour fewer trips when compared to the existing approvals for the site.

According to the Adequate Public Facilities Standards, dated June 1, 2015, the Property is served by Montgomery County Fire Station #32, located at the corner of Darnestown and Shady Grove Road, approximately 1.3 miles from the site thereby ensuring a prompt response time in the event of an emergency. The water and sewer for the Project will be provided by the DPW. A water and sewer authorization application has been submitted to DPW for review.

iv. *Adversely affect the natural resources or environment of the City of surrounding areas;*

The Project will not adversely affect the natural resources or environment of the City or the surrounding areas. As discussed above, the Project will provide on-site quality and quantity stormwater measures. The reduction of impervious surface and new SWM systems will benefit the environment of the City as well as the surrounding area.

v. *Be in conflict with the Plan;*

As discussed in detail in Section V of this Statement, the Project is consistent with the Comprehensive Plan and the Municipal Growth Element.

vi. *Constitute a violation of any provision of [the Zoning Ordinance] or other applicable law; or*

The Project will satisfy the City's laws and regulations that govern development of the Property. As discussed in Section VI of this Statement, the Project complies with all of the

development standards for the MXNC Zone, the Landscape Manual, and the City's Green Building Standards.

vii. *Be incompatible with the surrounding uses or properties.*

The Project will be entirely compatible with the surrounding uses which consist of single family homes to the north, south and west, and townhomes to the east. As discussed in detail above, the Project will promote this compatibility by retaining significant landscaping and providing new landscaping, which will enhance the buffers to the confronting uses.

VIII. Community Outreach

The applicant has conducted outreach meetings with the Rockshire HOA, as well as individual homeowners neighboring the property, and has conducted two Area Wide Community Meetings to discuss with the community the re-development of the property. (June 2015 and Dec 2015) plus meetings with a newly formed resident committee.

The Applicant held pre-submission community meetings on June 25 and December 16, 2015. Details regarding those meetings, including minutes, are being submitted with this Application in accordance with the standards set forth in the Zoning Ordinance and the City's Development Review Manual. The Applicant also held many additional outreach meetings with individuals and smaller groups.

IX. Conclusion

As discussed herein, the Project represents an important economic development opportunity that will revitalize one of the City's obsolete shopping centers with upscale residential, opportunities for neighborhood-oriented retail space, open space amenities, landscaping, walking trails, and other improvements. The Project is consistent with the recommendations of the Master Plan and furthers its goals and objectives. The Project also complies with all applicable requirements of the Zoning Ordinance that govern development in the MXNC Zone. For the reasons expressed throughout this Statement, we respectfully request that the Planning Commission recommend approval of the Project Plan Amendment.

